

2011-254

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July 27, 2011

received
8/30/11 Wed

SWI

Via Certified Mail - Return Receipt Requested

Managing Agent
Stevedoring Services of America Terminals, Inc.
SSA Marine, Inc.
1131 SW Klickitat Way
Seattle WA 98134

Via Certified Mail - Return Receipt Requested

Managing Agent
Stevedoring Services of America Terminals, Inc.
SSA Marine, Inc.
1050 SW Spokane St.
Seattle, WA 98134

RECEIVED EPA OGC/CCU
2011 AUG 12 PM 2:57

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION
PLAN**

Dear Managing Agent:

We represent **Puget Soundkeeper Alliance**, 5305 Shilshole Ave. NW, Suite 150, Seattle, WA 98107, (206) 297-7002. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Puget Soundkeeper Alliance's intent to file a citizen suit against Stevedoring Services of America Terminals, Inc. and SSA Marine, Inc. (collectively "SSA") under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by SSA's National Pollution Discharge Elimination System permit.

SSA has violated and continues to violate the CWA (see sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and its National Pollutant Discharge Elimination System Permit No. **WAR000467 ("2010 Permit")** with respect to operations of, and discharges of stormwater and pollutants from, its facility located at 2900 11th Ave. SW, Terminal 18, Seattle, WA 98134 (the "facility" or "site") as described herein to waters of the state. The 2010 Permit (the Industrial Stormwater General Permit) was issued by the Washington Department of Ecology on October 21, 2009, with an effective date of January 1, 2010. SSA also violated the conditions of its coverage under the previous Industrial Stormwater General Permit, Permit No. S03000467, issued by Ecology on August 21, 2002, effective on September 20, 2002, modified on December 1, 2004, effective January 14, 2005, expiring

September 20, 2007, reissued August 15, 2007, effective September 15, 2007, reissued again on October 15, 2008, effective November 15, 2008, expiring April 30, 2009, but remaining effective through December 31, 2009 ("2005 Permit"). These violations of the 2005 Permit are ongoing as the 2010 Permit includes conditions substantially similar to those of the 2005 Permit that SSA violated.

I. Compliance with standards

A. Condition S10.A. of the 2010 Permit prohibits discharges that cause or contribute to violations of water quality standards. SSA discharges to the Duwamish Waterway, which does not meet water quality standards for PCBs, dissolved oxygen, fecal coliform, ammonia-N, and HPAHs and is included on the state's "303(d) list" of impaired waterbodies. SSA discharges stormwater that contains elevated levels of zinc, copper, turbidity and fecal coliform as indicated in the table of exceedences below. These discharges contribute to violations of water quality standards in the Duwamish Waterway on each and every day since January 1, 2010, on which there was 0.1 inch or more of precipitation, and continue to occur. Precipitation data from King County International Airport is appended to this notice of intent to sue and identifies these days.

<u>Quarter in which sample collected</u>	<u>Zn Concentration (Benchmark 117 ug/L)</u>	<u>Cu Concentration (Benchmark 14 ug/L)</u>	<u>Turbidity (Benchmark 25 NTU)</u>	<u>Fecal coliform (Effluent limit 100col/100mL)</u>
1 st Quarter 2010	162 ug/L			208/100mL
2 nd Quarter 2010	136			120000
3 rd Quarter 2010	233	27.9 ug/L	29.7 NTU	113000
4 th Quarter 2010:				
Outfall M03	123			2800
Outfall M08	470	30.8		117000
Outfall M09	330	18.2	33.9	3000
Outfall M10	244			59200
Outfall M14	310	19		21400
Outfall M17	285	28.3		161000
Outfall 18	255	18.6		112000
1 st Quarter 2011:				
Outfall M03	164	21.2		
Outfall M08	1030	74.5		
Outfall M09	470	35.4	32.6	
Outfall M10	810	66.1	80.1	
Outfall M14	153			
Outfall M17	227	29.9	35.5	
Outfall 18	243	18.5	37.1	>20000

B. Condition S10.C. of the 2010 Permit requires SSA to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparation and implementation of an adequate stormwater pollution prevention plan ("SWPPP") and best management practices ("BMPs"). SSA has violated and continues

to violate this condition by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below in this notice of intent to sue.

II. Stormwater Pollution Prevention Plan

A. Condition S3.A.1. of the 2010 Permit requires SSA to develop and implement a SWPPP as specified. S3.A.2. specifies that the SWPPP must specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. For the reasons discussed in sections I.A. and B. of this notice of intent to sue and below, SSA is in violation of this condition.

B. Condition S3.A.3.a. of the 2010 Permit requires that BMPs in SSA's SWPPP be consistent with the Stormwater Management Manual for Western Washington (2005 edition) ("SWMMWW"), which is available on the internet at <http://www.ecy.wa.gov/programs/wq/stormwater/manual.html>. SSA is in violation of Condition S3.A. because it is not implementing a SWPPP that is consistent with this manual, including the housekeeping and structural source control BMPs identified in the manual.

C. Condition S3.B. of the Permit provides specific SWPPP requirements. SSA is in violation of this condition because its SWPPP does not satisfy these requirements. Condition S3.B.4.b. of the 2010 Permit identifies mandatory BMPs that must be included in the SWPPP and implemented, unless SSA clearly justifies why the each omitted mandatory BMP is unnecessary, infeasible, or replaced by alternative and equally effective BMPs. The mandatory BMPs omitted by SSA in violation of this condition include vacuuming paved surfaces with a vacuum sweeper at least once per calendar quarter (S3.B.4.b.i.2.a.), preventive maintenance BMPs to maintain the stormwater drainage systems, including a schedule or frequency for each maintenance task (S3.B.4.b.3.), having a spill prevention and emergency cleanup plan as specified (S3.B.4.b.i.4.), provisions for employee training, including a training log (S3.B.4.b.i.5.), adequate measures to identify and eliminate the discharge of process wastewater (S3.B.4.b.i.7.), the "applicable" BMPs from the SWMMWW (S3.B.4.b.ii.1.), and location of industrial materials and activities inside or protecting them with storm resistant coverings (S3.B.4.b.ii.2.).

D. Condition S3.B.5. of the 2010 Permit describes the monitoring plan that must be included in the SWPPP. SSA is in violation of this condition because it does not have a monitoring plan that includes all the required elements, including identification of all points of discharge and documentation of why each discharge point is not sampled.

III. Monitoring

A. Condition S4.B.2. of the 2010 Permit requires SSA to sample each distinct point of discharge off-site except as otherwise exempt from monitoring as a "substantially identical outfall" per S3.B.5.b. SSA is in violation of this condition because it does not sample each distinct point of discharge off-site.

B. Condition S4.B.3. of the 2010 Permit requires SSA to record and retain specified information about each stormwater sample taken. SSA is in violation of this condition because it has not recorded and retained the specified information, including a notation describing if it collected the sample within the first 30 minutes of stormwater discharge events and, if not, an explanation why not.

C. Condition S4.A. and B. of the 2010 Permit require SSA to collect stormwater samples no less than once per quarter. Condition S4. of the 2005 Permit included a substantially similar sample collection requirement. Condition S9.A. of the 2010 Permit requires SSA to report results of analysis of these samples to Ecology on specified forms (Discharge Monitoring Reports, or "DMRs") on a specified schedule. Condition S5.A. of the 2005 Permit included a substantially similar requirement. SSA has violated these conditions by failing to collect stormwater samples in and/or to submit DMRs for the following monitoring periods: 3rd quarter 2006, 2nd and 3rd quarters 2007, 2nd quarter 2008, and 2nd and 4th quarter 2009.

IV. Inspections

Condition S7.A. of the 2010 Permit requires that SSA ensure that an inspection of its site by qualified personnel occur every month. Condition S7.B. requires that each such inspection include specified components. Condition S7.C. specifies the records that must be kept for each inspection. SSA is in violation of these conditions by failing to conduct inspections on a monthly basis by qualified personnel as required. SSA has not made and recorded the observations at sampling locations, for visible characteristics of discharges, or for illicit discharges. SSA has not maintained inspection reports including the requisite information.

V. Corrective actions

A. Condition S8.B. of the 2010 Permit requires SSA to undertake a Level 1 corrective action whenever it exceeds a benchmark value. A Level 1 corrective action comprises review of the SWPPP to ensure permit compliance, revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges, including signature and certification of the revised SWPPP, summary of the Level 1 corrective action in the annual report, and full implementation of the revised SWPPP as soon as possible, but no later than the DMR due date for the quarter the benchmark was exceeded. Condition S4.C. of the 2005 Permit includes a substantially similar requirement. SSA is in violation of these requirements because it failed to perform Level 1 responses or corrective actions as specified by the permits for all of the exceedences of the benchmarks identified in the table in section I.A. of this notice of intent to sue.

B. Condition S8.C. of the 2010 Permit requires SSA to undertake a Level 2 corrective action whenever it exceeds a benchmark value for any two quarters during a calendar year. A Level 2 corrective action comprises review of the SWPPP to ensure permit compliance, revision of the SWPPP to include additional structural source control BMPs with

the goal of achieving the benchmark in future discharges, including signature and certification of the revised SWPPP in accordance with S3.A.6., summary of the Level 2 corrective action (planned or taken) in the annual report, and full implementation of the revised SWPPP by September 30 of the following year, including installation of necessary structural source control BMPs.

In 2010, SSA triggered Level 2 corrective action requirements for turbidity, zinc and copper by exceeding the benchmarks for these parameters (see Cond. S5.A.) as indicated in the table in section I.A. of this notice of intent to sue. SSA has violated the Permit's Level 2 corrective action requirements by failing to take any of the prescribed measures for any of these parameters.

C. Condition S8.D. of the 2010 Permit requires SSA to undertake a Level 3 corrective action whenever it exceeds a benchmark value for any three quarters during a calendar year. A Level 3 corrective action comprises review of the SWPPP to ensure permit compliance, revision of the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark values in future discharges, which revision must be signed and certified in accordance with S3.A.6. and the portion of the SWPPP dealing with treatment BMPs designed and stamped by a professional engineer, geologist, hydrogeologist, or Certified Professional in Storm Water Quality, summary of the Level 3 corrective action (planned or taken) in the annual report, and full implementation of the revised SWPPP, including installation of necessary treatment BMPs, by September 30 of the following year.

In 2010, SSA triggered Level 3 corrective action requirements for zinc by exceeding the benchmarks for these parameters as indicated in the table in section I.A. of this notice of intent to sue. SSA has violated the Permit's Level 3 corrective action requirements by failing to take any of the prescribed measures for this parameter.

D. Condition S8.A. of the 2010 Permit requires SSA to implement any applicable Level 1, 2, or 3 responses required by the 2005 Permit. SSA triggered a Level 3 response under the 2005 Permit by exceeding zinc action levels in the 4th quarter 2005, 1st quarter 2006, 3rd quarter 2008, and 1st quarter 2009 (381, 2960, 470 and 440 ug/L respectively). Under the previous permit, the Level 3 response required identification of potential pollutant sources, investigation of all available options for source control, operational control and stormwater treatment BMPs, implementation of additional source control, operational control and stormwater treatment BMPs within twelve months of initiating the Level 3 response, and preparation and submission to Ecology of a Level 3 report within those same twelve months (See 2005 Permit Cond. S4.C.). SSA failed to perform this Level 3 response by failing to investigate all available control options, or implement additional BMPs, including treatment BMPs.

IV. Effluent limitations

Condition S6.C. of the Permit establishes a numeric effluent limitation for fecal coliform concentrations in SSA's discharge of 100 col./100 ml. SSA violated this effluent

2011Precip. (in)	Events
8 0.00	
9 0.00	
10 0.09	Rain
11 0.04	Rain
12 0.00	
13 0.07	Rain
14 0.39	Rain
15 0.02	Rain
16 0.15	Rain
17 0.00	
18 0.02	
19 0.00	
20 0.00	
21 0.04	Rain
22 0.00	
23 0.00	
24 0.05	Rain
25 0.45	Rain
26 0.03	Rain
27 0.44	Rain
28 0.04	Rain
29 0.04	Rain
30 0.17	Rain
2011Precip. (in)	Events
May sum	
1 0.00	
2 0.22	Rain
3 0.00	Rain
4 0.00	
5 0.04	Rain
6 0.12	Rain
7 0.04	Rain
8 0.17	Rain
9 0.00	
10 0.00	
11 0.51	Rain
12 0.00	
13 0.00	
14 0.52	Rain
15 0.69	Rain
16 0.00	
17 0.00	Fog
18 0.00	
19 0.00	
20 0.00	
21 0.10	Rain
22 0.00	Rain
23 0.00	
24 0.00	
25 0.24	Rain
26 0.04	Rain
27 0.09	Rain
28 0.00	Rain
29 0.00	
30 0.00	
31 0.06	Rain
2011Precip. (in)	Events
Jun sum	
1 0.24	Rain
2 0.25	Rain
3 0.00	
4 0.00	
5 0.00	
6 0.00	
7 0.10	Rain
8 0.00	Rain
9 0.00	
10 0.00	
11 0.00	
12 0.00	Rain
13 0.03	Rain
14 0.00	
15 0.11	Rain
16 0.00	
17 0.00	
18 0.30	Rain
19 0.03	Rain
20 0.00	Rain
21 0.00	
22 0.00	
23 0.01	Rain
24 0.12	Rain
25 0.00	
26 0.00	
27 0.00	Rain
28 0.00	
29 0.00	
30 0.00	
2011Precip. (in)	Events
Jul sum	
1 0.00	
2 0.00	
3 0.00	Rain
4 0.00	
5 0.00	
6 0.00	
7 0.01	Rain
8 0.00	
9 0.00	
10 0.00	
11 0.00	Rain
12 0.09	Rain
13 0.01	
14 0.00	Rain
15 0.04	Rain
16 0.33	Rain
17 0.06	Rain
18 0.00	
19 0.00	
20 0.00	
21 0.00	
22 0.00	
23 0.00	
24 0.00	
25 0.27	Rain
26 0.00	

limitation in at least 11 times in the 1st, 2nd, and 3rd quarters 2010, and the 1st quarter of 2011 as indicated in the table in section I.A. of this notice of intent to sue.

V. Reporting permit violations

Condition S9.B. of the 2010 Permit requires SSA to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in S8.B – D. If corrective action is not yet completed at the time of submission of the annual report, SSA must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date SSA expects to complete corrective actions.

SSA's has violated this condition. The annual report submitted by SSA for 2010 (in May 2011) does not include the required information. Specifically, the form provided by Ecology is not completely filled out, and there is no discussion of Level 2 additional structural source controls or any discussion or recognition of Level 3 response requirements.

VI. Request for SWPPP

Pursuant to Condition S9.F. of the 2010 Permit, Puget Soundkeeper Alliance hereby requests that SSA provide a copy of its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should SSA fail to provide the requested complete copy of its SWPPP as required by Condition S9.F of the Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

Conclusion

The above-described violations reflect those indicated by the information currently available to Puget Soundkeeper Alliance. These violations are ongoing. Puget Soundkeeper Alliance intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 USC § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$37,500 per day for each violation. In addition to civil penalties, Puget Soundkeeper Alliance will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and


such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Puget Soundkeeper Alliance believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Stevedoring Services of America Terminals, Inc. and SSA Marine, Inc. under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: 
Richard A. Smith

cc: Lisa Jackson, Administrator, U.S. EPA
Dennis McLerran, Region 10 Administrator, U.S. EPA
Ted Sturdevant, Director, Washington Department of Ecology
Kyle B. Lukins, Registered Agent, P.O. Box 24868, Seattle, WA 98134

2010Precip. (in)		Events
Jan sum		
1	0.39	Rain
2	0.05	Rain
3	0.02	Rain
4	0.82	Rain
5	0.09	Rain
6	0.00	
7	0.03	Rain
8	0.91	Rain
9	0.07	Rain
10	0.10	Rain
11	1.03	Rain
12	0.63	Rain
13	0.39	Rain
14	0.31	Rain
15	0.52	Rain
16	0.02	Fog, Rain
17	0.12	Rain
18	0.00	Rain
19	0.02	Rain
20	0.01	
21	0.00	
22	0.00	
23	0.01	Rain
24	0.35	Rain
25	0.12	Rain
26	0.00	
27	0.00	Fog
28	0.00	
29	0.02	Rain
30	0.20	Rain
31	0.06	Rain
2010Precip. (in) Events		
Feb sum		
1	0.06	Fog, Rain
2	0.02	Rain
3	0.27	Rain
4	0.08	Rain
5	0.08	Rain
6	0.24	Rain
7	0.09	Rain
8	0.00	Rain
9	0.00	Fog
10	0.08	Fog, Rain
11	0.23	Rain
12	0.43	Rain
13	0.23	Rain
14	0.86	Rain
15	0.04	Fog, Rain
16	0.19	Rain
17	0.00	
18	0.00	
19	0.00	
20	0.00	
21	0.00	
22	0.00	
23	0.14	Rain
24	0.11	Rain
25	0.06	Rain
26	0.49	Rain
27	0.09	Rain
28	0.00	
2010Precip. (in) Events		
Mar sum		
1	0.00	
2	0.06	Rain
3	0.00	
4	0.00	Rain
5	0.00	
6	0.00	
7	0.05	Rain
8	0.04	Rain
9	0.00	Rain
10	0.03	Rain
11	0.49	Rain
12	0.57	Rain
13	0.01	Rain
14	0.00	Rain
15	0.01	Rain
16	0.06	Rain
17	0.01	
18	0.00	
19	0.00	
20	0.00	
21	0.03	Rain
22	0.00	Rain
23	0.00	
24	0.00	
25	0.43	Rain
26	0.00	
27	0.00	
28	0.65	Rain
29	0.83	Rain, Thunderstorm
30	0.08	Rain
31	0.01	
2010Precip. (in) Events		
Apr sum		
1	0.08	Rain
2	0.68	Rain
3	0.17	Rain
4	0.08	Rain
5	0.14	Rain
6	0.00	
7	0.11	Rain
8	0.09	Rain
9	0.07	Rain
10	0.00	
11	0.00	
12	0.00	
13	0.06	Rain
14	0.00	
15	0.00	Rain
16	0.01	Rain
17	0.18	Rain
18	0.01	
19	0.00	
20	0.01	Rain
21	0.65	Rain
22	0.00	
23	0.11	Rain
24	0.01	Rain
25	0.00	
26	0.29	Rain
27	0.29	Rain

2010Precip. (in)	Events
28 0.26	Rain
29 0.00	
30 0.03	Rain
2010Precip. (in) Events	
May sum	
1 0.00	Rain
2 0.08	Rain
3 0.09	Rain
4 0.44	Rain
5 0.20	Rain
6 0.00	
7 0.00	
8 0.00	
9 0.00	
10 0.16	Rain
11 0.01	
12 0.00	
13 0.00	
14 0.00	
15 0.00	
16 0.00	Rain
17 0.01	
18 0.18	Rain
19 0.28	Rain
20 0.13	Rain
21 0.04	Rain
22 0.09	Rain
23 0.18	Rain
24 0.00	
25 0.07	Rain
26 0.28	Rain
27 0.04	Rain
28 0.30	Rain
29 0.04	Rain
30 0.08	Rain
31 0.22	Rain
2010Precip. (in) Events	
Jun sum	
1 0.07	Rain
2 0.21	Rain
3 0.01	Rain
4 0.29	Rain
5 0.04	Rain
6 0.26	Rain
7 0.08	Rain
8 0.23	Rain
9 0.22	Rain
10 0.08	Rain
11 0.01	Rain
12 0.00	
13 0.00	
14 0.00	
15 0.17	Rain
16 0.22	Rain
17 0.00	
18 0.00	
19 0.03	Rain
20 0.17	Rain
21 0.00	
22 0.00	
23 0.00	
24 0.00	
25 0.00	
26 0.00	
27 0.00	Rain
28 0.00	
29 0.00	
30 0.00	
2010Precip. (in) Events	
Jul sum	
1 0.02	Rain
2 0.17	Rain
3 0.00	
4 0.07	Rain
5 0.00	Rain
6 0.00	
7 0.00	
8 0.00	
9 0.00	
10 0.00	
11 0.00	
12 0.00	Rain
13 0.00	
14 0.00	
15 0.00	
16 0.00	
17 0.00	
18 0.00	
19 0.00	
20 0.00	
21 0.00	
22 0.00	
23 0.00	
24 0.00	
25 0.00	
26 0.00	
27 0.00	
28 0.00	
29 0.00	
30 0.00	Fog
31 0.00	
2010Precip. (in) Events	
Aug sum	
1 0.00	
2 0.00	
3 0.00	
4 0.00	
5 0.04	Rain
6 0.00	
7 0.16	Rain
8 0.01	Rain
9 0.00	Rain
10 0.00	
11 0.00	
12 0.00	
13 0.00	
14 0.00	
15 0.00	
16 0.00	
17 0.00	
18 0.00	
19 0.00	
20 0.00	
21 0.01	Rain

2010	Precip. (in)	Events
22	0.00	Rain
23	0.00	
24	0.00	
25	0.00	
26	0.00	Rain
27	0.00	
28	0.00	
29	0.00	
30	0.00	
31	0.37	Rain
2010	Precip. (in)	Events
Sep	sum	
1	0.00	
2	0.00	
3	0.00	
4	0.02	Rain
5	0.00	
6	0.12	Rain
7	0.01	Rain
8	0.25	Rain
9	0.02	Rain
10	0.00	
11	0.00	
12	0.00	
13	0.00	
14	0.00	
15	0.21	Rain
16	0.44	Rain
17	0.70	Fog, Rain
18	0.91	Rain
19	0.63	Rain
20	0.00	Rain
21	0.00	
22	0.00	
23	0.20	Rain
24	0.03	Rain
25	0.00	
26	0.27	Rain
27	0.04	Rain
28	0.01	Rain
29	0.00	
30	0.00	
2010	Precip. (in)	Events
Oct	sum	
1	0.00	
2	0.00	
3	0.00	
4	0.00	
5	0.00	
6	0.01	
7	0.00	
8	0.08	Rain
9	1.01	Rain
10	0.62	Rain
11	0.00	
12	0.00	
13	0.01	
14	0.13	Rain
15	0.00	Rain
16	0.00	
17	0.00	
18	0.00	
19	0.00	
20	0.01	
21	0.01	Rain
22	0.13	Rain
23	0.45	Rain
24	0.68	Rain
25	0.41	Rain
26	0.17	Rain
27	0.00	
28	0.09	Rain
29	0.03	Rain
30	0.41	Rain
31	0.06	Rain
2010	Precip. (in)	Events
Nov	sum	
1	1.35	Rain
2	0.00	
3	0.00	
4	0.00	
5	0.07	Rain
6	0.89	Rain
7	0.03	Rain
8	0.00	
9	0.19	Rain
10	0.00	
11	0.08	Rain
12	0.00	
13	0.12	Rain
14	0.34	Rain
15	0.04	Rain
16	0.00	
17	0.12	Rain
18	0.14	Rain
19	0.08	Rain
20	0.01	Rain
21	0.00	Snow
22	0.07	Fog, Snow
23	0.00	Rain, Snow
24	0.00	
25	0.01	Snow
26	0.39	Rain
27	0.01	
28	0.05	Rain
29	0.09	Rain
30	0.69	Rain
2010	Precip. (in)	Events
Dec	sum	
1	0.00	
2	0.01	Fog, Rain
3	0.00	
4	0.00	
5	0.00	
6	0.00	
7	0.47	Rain
8	0.74	Rain
9	0.99	Rain
10	0.00	
11	1.37	Rain
12	2.24	Rain
13	0.34	Rain
14	0.57	Rain
15	0.09	Rain

2010	Precip. (in)	Events
16	0.02	Rain
17	0.00	
18	0.13	Rain
19	0.14	Rain
20	0.07	Rain
21	0.04	Rain
22	0.02	Rain
23	0.43	Rain
24	0.44	Rain
25	0.28	Rain
26	0.24	Rain
27	0.46	Rain
28	0.00	Rain
29	0.00	Rain
30	0.00	
31	0.00	

2011	Precip. (in)	Events
Jan sum		
1	0.00	
2	0.00	
3	0.00	
4	0.03	Rain
5	0.11	Rain
6	0.28	Rain
7	0.52	Rain
8	0.01	
9	0.03	Rain
10	0.00	
11	0.12	Fog, Snow
12	0.74	Rain, Snow
13	0.66	Rain
14	0.08	Rain
15	0.42	Rain
16	0.11	Rain
17	0.00	Rain
18	0.08	Rain
19	0.00	
20	0.05	Rain
21	0.68	Rain
22	0.00	
23	0.04	Rain
24	0.26	Rain
25	0.00	
26	0.00	
27	0.00	Fog
28	0.07	Rain
29	0.26	Rain
30	0.00	
31	0.00	

2011	Precip. (in)	Events
Feb sum		
1	0.00	Rain
2	0.00	
3	0.02	Rain
4	0.06	Rain
5	0.09	Rain
6	0.11	Rain
7	0.06	Rain
8	0.01	
9	0.00	
10	0.00	
11	0.00	
12	0.45	Rain
13	0.28	Rain
14	0.84	Rain
15	0.15	Rain
16	0.04	Rain
17	0.02	Rain
18	0.00	
19	0.00	
20	0.00	
21	0.06	
22	0.20	Rain, Snow
23	0.08	Fog, Snow
24	0.01	Snow
25	0.00	
26	0.00	Snow
27	0.51	Rain
28	0.22	Rain

2011	Precip. (in)	Events
Mar sum		
1	0.22	Rain
2	0.14	Rain
3	0.35	Rain
4	0.12	Rain
5	0.00	Rain
6	0.00	
7	0.00	Rain
8	0.10	Rain
9	1.47	Rain
10	0.41	Rain
11	0.00	
12	0.47	Rain
13	0.85	Rain
14	0.30	Rain
15	0.43	Rain, Thunderstorm
16	0.22	Rain
17	0.00	
18	0.18	Rain
19	0.00	
20	0.01	Rain
21	0.01	Rain
22	0.00	
23	0.00	
24	0.04	Rain
25	0.11	Rain
26	0.08	Fog, Rain
27	0.19	Rain
28	0.11	Rain
29	0.13	Rain
30	0.09	Rain
31	0.11	Rain

2011	Precip. (in)	Events
Apr sum		
1	0.85	Rain
2	0.25	Rain
3	0.07	Rain
4	0.12	Rain
5	0.15	Rain
6	0.10	Rain
7	0.09	Rain